

# EXHIBIT A

**Lisa Ranieri**

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**From:** Megan Benett  
**Sent:** Friday, May 21, 2021 5:39 PM  
**To:** Lisa Ranieri  
**Subject:** Fwd: CONFERENCE CALL 10am May 17 DIAL IN

**From:** "Shen, Andrew C." <ashen@kellogghansen.com>  
**Date:** May 17, 2021 at 10:31:29 AM EDT  
**To:** "Steven R. Pounian" <Spounian@kreindler.com>, "Kellogg, Michael K." <mkellogg@kellogghansen.com>, "Rapawy, Gregory G." <grapawy@kellogghansen.com>, "Huppert, Matthew R." <mhuppert@kellogghansen.com>  
**Cc:** Jim Kreindler <JKreindler@kreindler.com>, "Andrew J. Maloney" <AMaloney@kreindler.com>, Megan Benett <Mbenett@kreindler.com>, scarter1@cozen.com, zScott Tarbutton <starbutton@cozen.com>, zRobert Haefele <rhaefele@motleyrice.com>, "Goldman, Jerry" <jgoldman@andersonkill.com>, John Fawcett <Jfawcett@kreindler.com>, "Kry, Robert" <rkry@mololamken.com>, "Nitz, Eric" <enitz@mololamken.com>  
**Subject:** RE: CONFERENCE CALL 10am May 17 DIAL IN

Steve –

As we just discussed on the call, Saudi Arabia will oppose any request that Plaintiffs' expert reports be submitted after June 30, 2021.

I also informed you that I currently have a conflict on June 22, and that if Plaintiffs identify the third-party witness they intend to subpoena, I could tell you whether someone else from our side could cover this deposition. You stated that you were unwilling to disclose the identity of the witness until the subpoena is served, because doing so may "complicate service." We disagree with any implication that Saudi Arabia has or will interfere with the service of any subpoena. But, the parties agreed that once the subpoena is issued, and in no event no more than four weeks from the noticed date, you will inform us of the identity of the non-party witness. If this is a deposition that I will need to cover, I will attempt to address my scheduling conflict on June 22. But, if I am unable to, you agreed that the parties and the witness will meet and confer about an alternative deposition date.

Thanks,

Andy

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**From:** Steven R. Pounian <Spounian@kreindler.com>  
**Sent:** Friday, May 14, 2021 2:27 PM  
**To:** Shen, Andrew C. <ashen@kellogghansen.com>; Kellogg, Michael K. <mkellogg@kellogghansen.com>; Rapawy, Gregory G. <grapawy@kellogghansen.com>; Huppert, Matthew R. <mhuppert@kellogghansen.com>  
**Cc:** Kreindler, James <jkreindler@kreindler.com>; Maloney, III, Andrew <amaloney@kreindler.com>; Megan Benett <Mbenett@kreindler.com>; SCarter1@cozen.com; Tarbutton, Joseph <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>; Goldman, Jerry

<jgoldman@andersonkill.com>; John Fawcett <jfawcett@kreindler.com>; Kry, Robert  
<rkry@mololamken.com>; 'Nitz, Eric' <enitz@mololamken.com>

**Subject:** [EXTERNAL] CONFERENCE CALL 10am May 17 DIAL IN

Here is the information for the Monday 10am call

**Dial In Numbers:**

**US/CAN Toll free: 1-888-450-5996**

**Participant Passcode: 105014**

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**From:** Shen, Andrew C. <[ashen@kelloggghansen.com](mailto:ashen@kelloggghansen.com)>

**Sent:** Friday, May 14, 2021 2:00 PM

**To:** Steven R. Pounian <[Spounian@kreindler.com](mailto:Spounian@kreindler.com)>; Kellogg, Michael K. <[mkellogg@kelloggghansen.com](mailto:mkellogg@kelloggghansen.com)>;  
Rapawy, Gregory G. <[grapawy@kelloggghansen.com](mailto:grapawy@kelloggghansen.com)>; Huppert, Matthew R.  
<[mhuppert@kelloggghansen.com](mailto:mhuppert@kelloggghansen.com)>

**Cc:** Jim Kreindler <[JKreindler@kreindler.com](mailto:JKreindler@kreindler.com)>; Andrew J. Maloney <[AMaloney@kreindler.com](mailto:AMaloney@kreindler.com)>; Megan  
Benett <[Mbenett@kreindler.com](mailto:Mbenett@kreindler.com)>; [SCarter1@cozen.com](mailto:SCarter1@cozen.com); zScott Tarbutton <[starbutton@cozen.com](mailto:starbutton@cozen.com)>;  
zRobert Haefele <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>; Goldman, Jerry <[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>; John  
Fawcett <[jfawcett@kreindler.com](mailto:jfawcett@kreindler.com)>; Kry, Robert <[rkry@mololamken.com](mailto:rkry@mololamken.com)>; 'Nitz, Eric'  
<[enitz@mololamken.com](mailto:enitz@mololamken.com)>

**Subject:** RE: Meet and confer

10am works for us.

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**From:** Steven R. Pounian <[Spounian@kreindler.com](mailto:Spounian@kreindler.com)>

**Sent:** Friday, May 14, 2021 12:21 PM

**To:** Shen, Andrew C. <[ashen@kelloggghansen.com](mailto:ashen@kelloggghansen.com)>; Kellogg, Michael K.  
<[mkellogg@kelloggghansen.com](mailto:mkellogg@kelloggghansen.com)>; Rapawy, Gregory G. <[grapawy@kelloggghansen.com](mailto:grapawy@kelloggghansen.com)>; Huppert,  
Matthew R. <[mhuppert@kelloggghansen.com](mailto:mhuppert@kelloggghansen.com)>

**Cc:** Kreindler, James <[jkreindler@kreindler.com](mailto:jkreindler@kreindler.com)>; Maloney, III, Andrew <[amaloney@kreindler.com](mailto:amaloney@kreindler.com)>;  
Megan Benett <[Mbenett@kreindler.com](mailto:Mbenett@kreindler.com)>; [SCarter1@cozen.com](mailto:SCarter1@cozen.com); Tarbutton, Joseph  
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<[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>; John Fawcett <[jfawcett@kreindler.com](mailto:jfawcett@kreindler.com)>

**Subject:** [EXTERNAL] Meet and confer

Dear Andy,

Plaintiffs request a meet and confer to address two issues.

The first issue is the schedule for expert reports.


For many different reasons, including the ongoing deposition schedule ordered by the Court, the need for the experts to review all depositions before preparing their reports, the COVID restrictions that prevented meetings with fellow PECs members and experts until now, and the amount of material, Plaintiffs need until at least September 15, 2021 to obtain expert reports.

The second issue is the scheduling of the deposition of a third-party witness who will be subpoenaed to appear on Tuesday, June 22.

We are available on Monday morning, May 17, at 10:00am.

Steve

**Steven R. Pounian**  
Of Counsel

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Please note our new address effective March 26, 2021. Phone and fax numbers remain the same.

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